

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SOCi, Inc.,

Plaintiff,

v.

Yext, Inc., Stuart Greer, Chris Brownlee,
Jenette Simisky, Megan Menesale, and Keith
Hadelman,

Defendants.

Case No. 1:24-cv-04530-RA-OTW

**DECLARATION OF JOSEPH D. LOCKINGER IN SUPPORT OF DEFENDANTS’
MOTION TO DISMISS SOCI INC.’S FIRST AMENDED COMPLAINT**

I, Joseph D. Lockinger, hereby declare, pursuant to 28 U.S.C. § 1746:

1. I am Special Counsel at Cooley LLP representing Yext, Inc., Stuart Greer, Chris Brownlee, Jenette Simisky, Megan Menesale, and Keith Hadelman (collectively, the “Defendants”).

2. I submit this declaration in support of Defendants’ August 13, 2024, Motion to Dismiss SOCi Inc.’s First Amended Complaint.

3. I have personal knowledge of the information stated below and, if called to testify, would testify as follows:

Documents

1. Attached as Exhibit A is a true and correct screenshot of SOCi Chief Product Officer Falk Gottlob’s May 2024 LinkedIn post, accessed on August 13, 2024.

2. Attached as Exhibit B is a true and correct printout of Megan Menesale’s LinkedIn profile, accessed on August 12, 2024.

3. Attached as Exhibit C is a true and correct printout of Chris Brownlee's LinkedIn profile, accessed on August 12, 2024.

4. Attached as Exhibit D is a true and correct printout of Stuart Greer's LinkedIn profile, accessed on August 12, 2024.

5. Attached as Exhibit E is a true and correct printout of Keith Hadelman's LinkedIn profile, accessed on August 12, 2024.

6. Attached as Exhibit F is a true and correct printout of Jenette Simisky's LinkedIn profile, accessed on August 12, 2024.

7. Attached as Exhibit G is a true and correct copy of Megan Menesale's Employee Inventions and Proprietary Information Agreement with SOCi, Inc. dated June 3, 2021.

8. Attached as Exhibit H is a true and correct copy of Jenette Simisky's Employee Inventions and Proprietary Information Agreement with SOCi, Inc. dated November 9, 2022.

9. Attached as Exhibit I is a true and correct copy of Stuart Greer's Employee Inventions and Proprietary Information Agreement with SOCi, Inc. dated November 24, 2020.

10. Attached as Exhibit J is a true and correct copy of Keith Hadelman's Employee Inventions and Proprietary Information Agreement with SOCi, Inc. dated September 5, 2023.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Dated: August 13, 2024

COOLEY LLP

s/ Joseph D. Lockinger

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